

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ABDULRAHMAN ALHARBI,

Plaintiff,

– v. –

GLENN BECK; THE BLAZE, INC.;
MERCURY RADIO ARTS, INC.; AND
PREMIERE RADIO NETWORKS, INC.

Defendants.

CIVIL ACTION NO.
1:14-cv-11550-PBS

DEFENDANTS’ PROPOSED VOIR DIRE

Defendants Glenn Beck (“Beck”), TheBlaze Inc., Mercury Radio Arts, Inc. and Premiere Networks, Inc. f/k/a Premiere Radio Networks, Inc. (collectively, “Defendants”), by their attorneys, Greenberg Traurig LLP, hereby submit the following proposed jury voir dire.

I. Knowledge of Case, Parties and Counsel

- A. This case involves a claim by an individual named Abdulrahman Alharbi against an individual named Glenn Beck and three companies responsible for the production, broadcast and distribution of radio and television shows hosted by Mr. Beck, TheBlaze, Inc., Mercury Radio Arts, Inc. and Premiere Radio Networks, Inc., f/k/a Premier Networks, Inc. Mr. Alharbi is referred to as the “Plaintiff.” Mr. Beck and his companies are referred to as the “Defendants.” In this lawsuit, Mr. Alharbi, the Plaintiff, alleges that certain statements made by Beck in the aftermath of the tragic bombing of the Boston Marathon in 2013 defamed him. Defendants deny that Mr. Beck made any defamatory statements. Do you have any particular knowledge of this case or any of the facts in connection with it, including anything you may have read or heard from any source whatsoever, such as a friend or relative?
- B. Have you read in the newspapers, or on the Internet, or seen on television or heard on radio, anything about this case?
- C. Are you acquainted in any way with the Plaintiff in this case, Abdulrahman Alharbi, or any family or friends of Mr. Alharbi?

- D. Are you familiar with Mr. Beck? If so, would it affect your ability to decide this case fairly?
- E. Do you have positive or negative opinions about Mr. Beck, or any of his television or radio programs? If so, please state what they are and why you feel that way.
- F. Have you or has anyone you know ever had dealings with Mr. Beck or any of the corporate Defendants in this case, TheBlaze, Mercury or Premiere? If so, would it affect your ability to decide this case fairly?
- G. Have you ever watched or listened to an episode of the “Glenn Beck Show” either on radio or television or on the internet? If so, did that experience give you a positive or negative feeling about Mr. Beck?
- H. Do you know anyone who is now, or had been, employed by Mr. Beck or TheBlaze, Mercury or Premiere? If so, please state the name of any person, your relationship with the person, when and where they were employed, and what his or her job was.
- I. Do you know or have you ever had any dealings with any of the parties’ attorneys or their law firms? The Plaintiff’s attorneys are Peter Haley and Gregory May of the law firm Nelson Mullins Riley & Scarborough LLP. The Defendants’ attorneys are Michael J. Grygiel and Zack Kleinsasser from the law firm Greenberg Traurig, LLP. If so, please describe the nature and extent of those contacts.
- J. Are you acquainted in any way with the Judge in this case, Hon. Patti B. Saris? If so, please describe the nature and extent of your relationship with Judge Saris.
- K. Do you know or recognize any of the other prospective jurors? If so, who and what is the nature of your relationship with him or her.
- L. Do you know any of the following individuals?
 - a. Matthew Carey
 - b. Misty Kaweck
 - c. Julie Talbott
 - d. Peter Kowenhoven
 - e. Michael Frederick, M.D.
 - f. Vihas Patel, M.D.
 - g. Joel Cheatwood
 - h. George (Joe) Weasel
 - i. Julie Talbott
 - j. Steve Emerson

II. Litigation History

- A. Have you, your family, or any close friends even been personally involved in a lawsuit, either as a party, witness or otherwise? If so, please describe the nature of the litigation and your association with it, including the type of case, whether you or the other persons identified were a plaintiff or defendant, and the outcome of the case. In general, what were your feelings about the experience? Did you believe the result was fair or unfair and why?
- B. Have you, your family, or any close friend or relative ever been the victim of defamation, libel, or slander? If so, please state when this occurred, and any other details regarding the situation. Please describe your feelings regarding the manner in which the situation was handled.
- C. Have you, your family, or any close friend or relative ever filed a lawsuit alleging defamation, libel, or slander? If so, please describe the nature of the charge or claim and the outcome.
- D. Have you, your family, or any close friend or relative ever been accused of defamation, libel or slander? If so, please describe the nature of the charge or claim and the outcome.
- E. Does the fact that this case involves a claim of defamation (in this case, also called "slander") cause you to feel one way or another about Plaintiff Alharbi, Defendant Beck, or any of the corporate defendants?
- F. Have you heard of people filing lawsuits claiming defamation, libel or slander? What do you think of that type of lawsuit?
- G. Have you, your family, or any close friend ever worked in the news industry, either as a reporter, an on-air personality, editor, or copy editor?
- H. Have you ever served on a jury before? If so, please describe when, in which court, whether the case was a civil or criminal matter and whether a verdict was returned. Do you consider that experience to be good, bad or otherwise?
 - a. If it was a defamation, libel, or slander case, what was the result? If the verdict was for the plaintiff, what is the amount that was awarded?

III. Corporations

- A. Do you feel that just because an individual has sued a company he is entitled to recover damages?
- B. Do you feel any bias or prejudice against TheBlaze, Mercury or Premiere because they are corporations or because they are defendants?

- C. Do you feel any bias or prejudice against Mr. Beck?
- D. In the eyes of the law, all parties, whether individuals or corporations, are to be treated alike. All parties are entitled to the same honest, fair and impartial treatment. If selected to serve a juror in this case, would you accept and apply this principle of law?
- E. If the evidence justifies it, could you find in favor of the Defendants just as easily as for the Plaintiff?
- F. Would you have any difficulty treating an individual who is wealthy in the same way you would treat someone who is not wealthy?

IV. General

- A. Is there anything in your background about which you think we should know but have not asked that could affect your ability to be a fair and impartial juror in this case?
- B. Can you keep an open mind and not come to any conclusions or decisions until you have heard all the evidence presented by the Plaintiff and the Defendants?
- C. Do you have any difficulty reading or understanding English?
- D. Do you suffer from any mental or physical disability that might impair your ability to hear or understand court proceedings?
- E. Have you or any member of your family attended law school or paralegal school or held any law or paralegal degree(s)?
- F. This trial is anticipated to last ten trial days. Does this present any hardship for you?
- G. Is there any other reason why you believe you would be unable to serve on the jury?

Dated: September 7, 2016

GREENBERG TRAURIG, LLP,

/s/ Zachary C. Kleinsasser

Michael J. Grygiel (*admitted pro hac vice*)

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*Attorneys for Defendants Glenn Beck;
TheBlaze Inc.; Mercury Radio Arts, Inc.;
and Premiere Networks, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2016 this document was served upon counsel to Plaintiff in this action.

/s/ Zachary C. Kleinsasser

Zachary C. Kleinsasser